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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MELINDA LOUISE RODRIGUEZ,
and ADELINE CORONEL,

Defendants.

Case No.: 2:21-mj-00836-BNW

**STIPULATION TO CONTINUE THE
PRELIMINARY EXAMINATION
HEARING
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between CHRISTOPHER CHIOU, United States Attorney, and ALLISON REESE, Assistant United States Attorney, counsel for the United States of America, and LANCE MANINGO, CJA counsel for Defendant MELINDA LOUISE RODRIGUEZ, and TODD LEVENTHAL, CJA appointed counsel for Defendant ADELINE CORONEL, that the preliminary examination hearing in the above-captioned matter, currently scheduled for October 21, 2021, at 4:00 p.m., be vacated and continued for fourteen (14) days, to a date and time to be set by this Honorable Court.

This stipulation is entered into for the following reasons:

1. The Government needs additional time to produce relevant discovery to Defense Counsel.

2. Defense Counsel needs additional time to review the discovery, conduct additional investigation, and confer with the Defendant about how he would like to proceed.

3. If a resolution is not made, the additional time will allow the government sufficient time to seek an indictment.

4. The parties agree to the continuance.

5. Defendant MELINDA RODRIGUEZ is in custody and does not object to the continuance.

6. Defendant ADELINE CORONEL is not in custody and does not object to the continuance.

7. Additionally, denial of this request for continuance could result in a miscarriage of justice.

8. The additional time requested herein is not sought for purposes of delay, but to allow for a potential pre-indictment resolution of the case.

9. The additional time requested by this stipulation, is allowed, with the defendants' consent under the Federal Rules of Procedure 5.1(d).

10. This is the first request for a continuation of the preliminary examination hearing.

DATED: October 18, 2021

Respectfully submitted,
CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Allison Reese
ALLISON REESE
Assistant United States Attorney

/s/ Lance Maningo
LANCE MANINGO
Counsel for Defendant Melinda Rodriguez

/s/ Todd Leventhal
TODD LEVENTHAL
Counsel for Defendant Adeline Coronel

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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Defendants.

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ORDER

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Government needs additional time to produce relevant discovery to Defense Counsel.

2. Defense Counsel needs additional time to review the discovery, conduct additional investigation, and confer with the Defendant about how ^{she} would like to proceed.

3. If a resolution is not made, the additional time will allow the government sufficient time to seek an indictment.

4. The parties agree to the continuance.

5. Defendant MELINDA RODRIGUEZ is in custody and does not object to the continuance.

6. Defendant ADELINE CORONEL is not in custody and does not object to the continuance.

7. Additionally, denial of this request for continuance could result in a miscarriage of justice.

3 9. The additional time requested by this stipulation, is allowed, with the defendants’
4 consent under the Federal Rules of Procedure 5.1(d).

5 || 10. This is the first request for a continuation of the preliminary examination hearing.

6 For all of the above-stated reasons, the ends of justice would best be served by a
7 continuance of the preliminary hearing date.

8 CONCLUSIONS OF LAW

9 The ends of justice served by granting said continuance outweigh the best interest of the
10 public and the defendant, since the failure to grant said continuance would be likely to result in
11 a miscarriage of justice, would deny the parties herein to potentially resolve the case prior to
12 indictment, and further would deny the parties sufficient time and the opportunity within which
13 to be able to effectively and thoroughly prepare for the preliminary hearing, taking into account
14 the exercise of due diligence.

15 The continuance sought herein is allowed, with the defendant's consent, pursuant to
16 Federal Rules of Procedure 5.1(d).

17 **ORDER**

IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for 11/4/2021 at 3:30 p.m. October 21, 2021, at 4:00 p.m., be vacated and continued to _____

21 DATED this 19th day of October, 2021.

22 
23 THE HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE